REMARKS

Applicants respectfully request reconsideration of this application as amended. Claims 1, 8 and 15 have been amended. Claims 6, 12-13 and 19 –20 were previously cancelled without prejudice. No new claims have been added. Therefore, claims 1-5, 6-11, 14-18 and 21 presented for examination. The following remarks are in response to the final Office Action, mailed May 23, 2006, and the advisory action, mailed August 10, 2006.

35 U.S.C. § 103 Rejections

Claims 1-5, 7-11, 14-18 and 21 stand rejected under 35 U.S.C. §103(a) as being anticipated by in view of U.S. Pat. Pub. No. 2002/0059535 of Bekritsky, et al. (Bekritsky) in view of U.S. Pat. No. 6,591,370 of Lovett, et al. (Lovett).

Applicants respectfully disagree with the Examiner's characterization of Bekritsky and Lovett and maintain their previous arguments. (see Response to final Office Action, mailed 05-23-06). However, for the sake of expediting issuance of this case, Applicants provide the following addition remarks.

Claim 1, as amended, recites:

> A method comprising:
> recording a first node local time of receiving a wirelessly transmitted packet at a first node, the first node local time recorded with a monotonically increasing clock of the first node;
> recording a second node local time of receiving the wirelessly transmitted packet at a second node, the second node local time recorded with a monotonically increasing clock of the second node;
> wirelessly transmitting the first node recorded local time by the first node to at least the second node;
> receiving the first node recorded local time at the second node and recording the first node local time of receiving the wirelessly transmitted packet; and

synchronizing a second node timing model with a first node timing model, wherein the first and second node timing models are updated at predetermined speeds to provide controlled time intervals; and

synchronizing the first and second node timing models with a global clock associated with the first node and the second node.

(emphasis added).

Bekritsky discloses synchronizing internal clocks of receiving stations of a locating system. (Abstract; [0006]). A beacon transmits reference data packets at a known position. A first arrival time is compared to a second arrival time to determine a correlated arrival time data. ([0006]) The difference in time of arrival of the packet at any two of the receivers allows computation of a unique hyperbola in space, along which the mobile device is located. By considering the difference in arrival time of the packet at an addition pair of two receivers, a second hyperbola in space can be computed, along which the mobile unit is located. The intersection of the two hyperbolas so defined determines the exact location of the mobile devices. An important feature of hyperbolic tilateration is that only the relative time of arrival of the packet at each pair of receiving stations needs to be known, and not the absolute time of arrival, or the actual time when the packets are received. ([0013])

Lovett discloses a multimode multiprocessor computer system with distributed local clocks wherein a local clock may be synchronized with other clocks in the system without affecting the operation of the other clocks. A local clock to be synchronized is reset and counts an elapsed time since the reset. Simultaneously with resetting the local clock, a clock value from a clock on a source node is copied to the node to be synchronized and added to the elapsed time. The resulting summation is then stored in the local clock to by synchronized. As a result the local clock is synchronized to the clock on the source node. The synchronization may occur while nodes are fully operational without resetting, stopping, or affecting the local clocks on the fully

operational nodes. This synchronization allows for dynamic partitioning wherein processor resources may be modified during operation of the computer system. (Abstract; [col. 1, ll. 65-67] – [col. 2, ll. 1-9])

In contrast, claim 1, in pertinent part, recites 1) "wirelessly transmitting the first node recorded local time . . . to at least the second node", 2) "receiving the first node recorded local time at the second node", and 3) "synchronizing a second node timing model with a first node timing model, wherein the first and second node timing models are updated at predetermined speeds to provide controlled time intervals" (emphasis added).

Applicants maintain their previous arguments regarding at least the first two aforementioned feature of claim 1. Additionally, Applicants respectfully submit that Berkritsky and Lovett, neither individually nor when combined, teach or reasonably suggest "synchronizing a second node timing model with a first node timing model, **wherein the first and second node timing models are updated at predetermined speeds to provide controlled time intervals**" as recited by claim 1 (emphasis added). Accordingly, for at least this reason, claim 1 is distinguishable over Bekritsky with Lovett. Applicants respectfully request the withdrawal of the rejection of claim 1 and its dependent claims.

Claims 8 and 15 include limitations similar to those of claim 1. Accordingly, Applicants respectfully request the withdrawal of the rejection of claims 8 and 15 and their dependent claims.

Conclusion

In light of the foregoing, reconsideration and allowance of the claims is hereby earnestly requested.

Invitation for a Telephone Interview

The Examiner is requested to call the undersigned at (303) 740-1980 if there remains any issue with allowance of the case.

Request for an Extension of Time

Applicant respectfully petitions for an extension of time to respond to the outstanding Office Action pursuant to 37 C.F.R. § 1.136(a) should one be necessary. Please charge our Deposit Account No. 02-2666 to cover the necessary fee under 37 C.F.R. § 1.17(a) for such an extension.

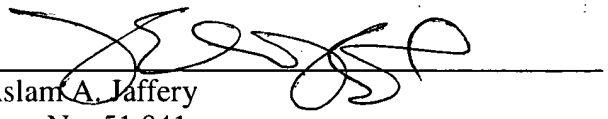
Charge our Deposit Account

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Date: August 23, 2006



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